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MAY 30 2012

IN THE UNITED STATES DISTRICT COURT U.S. DISTRICT COURT
FOR THE Middle DISTRICT OF TENNESSEE MD. DIST. TENN.
Nashville DIVISION

Brian M. Keys Name

Prison Id. No. #00499411

Kenneth R. Bell Name

Prison Id. No. #239065

Plaintiff(s)

v.

Sheriff Enoch George Name

Lt. Debra Wagonschutz Name

Mauzy County Jail Administration
Defendant(s)

(List the names of all the plaintiffs
filing this lawsuit. Do not use "et
al." Attach additional sheets if
necessary.)

Civil Action No. 1:12cv44
(To be assigned by the Clerk's
office. Do not write in this space.)

Jury Trial ☐ Yes ☐ No

(List the names of all defendants
against whom you are filing this
lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☐ Yes ☒ No

- B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs

N/A

Defendants

N/A

2. In what court did you file the previous lawsuit? N/A
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)
3. What was the case number of the previous lawsuit? N/A
4. What was the Judge's name to whom the case was assigned? N/A
5. When did you file the previous lawsuit? N/A (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? N/A
7. When was the previous lawsuit decided by the court? N/A (Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.
- ☐ Yes ☐ No N/A ☒

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? Mauvy County Jail, 1300 Lewis White Dr. Columbia, TN for both plaintiffs
- B. Are the facts of your lawsuit related to your present confinement?
- ☒ Yes ☐ No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
- N/A
- D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?
- ☐ Yes ☒ No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☒ Yes

☐ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? wrote grievances to staff with no response b/c there is no grievance procedure or a grievance committee.
2. What was the response of prison authorities? no response, only ignoring the facts at hand, which is neglect by Lt. Wagonschote

G. If you checked the box marked "No" in question II.E above, explain why not. _____

N/A

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☒ Yes

☐ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☒ Yes

☐ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? Wrote Captain Terryson, Chief Johns & Finch George w/ no response which is neglect
2. What was the response of the authorities who run the detention facility? No response, only ignoring the facts at hand, which is neglect

L. If you checked the box marked "No" in question II.I above, explain why not. _____

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Brian M. Keys, #00499411
Prison Id. No. of the first plaintiff: #00499411

Address of the first plaintiff: 1300 Lawson White Dr.
Columbia, TN 38401

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: Kenneth R. Bell

Prison Id. No. of the second plaintiff: #00239065

Address of the second plaintiff: 1300 Lawson White Dr.
Columbia, TN 38401

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Sheriff Enoch George

Place of employment of the first defendant: Maury County
Sheriff's Department

The first defendant's address: Work Address: 1300 Lawson
White Dr. Columbia, TN 38401
Home Address: UNKNOWN

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: Lieutenant Debra Wagonschutz

Place of employment of the second defendant: Maury County
Sheriff's Department

The second defendant's address: Work Address: 1300
Lawson White Dr. Columbia, TN 38401
Home Address: UNKNOWN

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

Refusal to pass out hygiene products (i.e., toothbrush, comb, soap, toothpaste & toilet paper) claiming they are on a budget. Every Wednesday night this occurs.

Refusal to pass out clean uniforms & towels when requested claiming the laundry is not doing laundry today.

Trustees with long hair & beards work with no hair nets everyday.

Fill out numerous medical requests to see nurse with no response.

Have inmates sleeping on the floor & double-celling inmates in crowded conditions with no recreational activity allowed, & no hot water in cells & living in buildings unfit for human habitation.

Rejecting mail without the mail rejection forms, opening legal mail envelopes & returning which violates air confidentiality rights.

Refusing inmates access to the law library where 100+ cases are pending.

Cutting 1-hour visits, 10 to 15 minutes short every week.

V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

- A. Sheriff George - Request to be expedited to state weekly ASA
- B. Lt. Wagonschütz - Request to have her grievance procedure examined
- C. Sheriff George - Request to have him step down as Sheriff
- D. Lt. Wagonschütz - Request to have her step down as Lieutenant
- E. Sheriff George - Request his financial budget be examined while he makes state inmates suffer
- F. I request a jury trial. ☒ Yes ☐ No

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: [Signature] Date: 05/25/12

Prison Id. No. #00409-111

Address: 1300 Lawson White
Columbia TN 38401

(Include the city, state and zip code.)

Signature: [Signature] Date: 5-25-12

Prison Id. No. 239065

Address: 1300 Lawson White Dr
Columbia Tenn 38401

(Include the city, state and zip code.)

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER. Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.